

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**Case No. 3:24-cr-00209**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID PAUL DANIEL,

Defendant.

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
REPLY IN SUPPORT OF  
DEFENDANT'S MOTION TO  
DISMISS, OR IN THE  
ALTERNATIVE, TO SUPPRESS  
AND MEMORANDUM IN  
SUPPORT**

Defendant, David Paul Daniel, moves to extend the deadline to file his Reply in Support of his Motion to Dismiss, or in the Alternative, to Suppress and Memorandum in Support (Doc. No. 25) by 5 days, to Monday, April 28, 2025. Mr. Daniel offers the following in support of this motion:

1. The current deadline is Wednesday, April 23, 2025. This is the deadline because, with Mr. Daniel's consent, the government requested and received a two week extension to respond to the Motion. The Motion and response involve a novel area of law and the reply will require a significant amount of legal research.
2. Counsel is traveling this week on a family vacation for his children's spring break.
3. Counsel has not requested any previous extensions.
4. The government does not oppose the relief requested in this Motion.

WHEREFORE, Mr. Daniel respectfully moves this Court to extend the deadline to file his reply in support of his Motion to Dismiss or Suppress through April 28, 2025.

Respectfully submitted this 21<sup>st</sup> day of April, 2025.

/s/ William R. Terpening

William R. Terpening

N.C. Bar No. 36418

Connor Reid

N.C. Bar No. 62617

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**CERTIFICATE OF SERVICE**

I certify that I have filed this **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS, OR IN THE ALTERNATIVE, TO SUPPRESS AND MEMORANDUM IN SUPPORT** through the Court's ECF system, which constitutes service on all parties.

Dated: April 21, 2025.

/s/ William R. Terpening  
William R. Terpening